

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

DOCKET NUMBER

05 10412 JT

*
CONCETTA NYMAN, *
PLAINTIFF *
*
V. *
FEDERAL RESERVE *
BANK OF BOSTON *
DEFENDANT *

PLAINTIFF'S INITIAL VOLUNTARY DISCLOSURE

The Plaintiff, pursuant to Fed.R.Civ.P.26 (a)(1), Local Rule 26.2, and Expense and Delay Reduction Plan Rule 2.02, hereby makes her initial disclosures in the above captioned matter. All disclosures herein are made without waiving any applicable objections, including but not limited to relevance, undue burden, privilege, attorney-client privilege, and work product doctrines. The identification herein of documents and individuals is made without waiving objections as to the admissibility of any such document or individual's testimony.

I. Individuals Likely To Have Discoverable Information Relevant To Disputed Facts Alleged With Particularity.

1. Plaintiff names all of the parties named in the Complaint as persons likely to have discoverable information.
2. Plaintiff adopts by reference those individuals identified in the Defendants' First Voluntary Disclosures filed in reference to the Complaint.

Keeper of Records for the Federal Reserve Bank of Boston;

Any individuals identified in the Defendants' initial voluntary disclosures.

II. Documents Currently In The Possession, Custody, or Control Of Plaintiff That Are Likely To Be Relevant To Disputed Facts Alleged With Particularity.

Personnel file of Plaintiff from Federal Reserve Bank of Boston

III. Damages - Plaintiff claims damages in the amount of \$200,000.00 including past and future medical bills, disability, lost wages and earning capacity, and physical and mental pain and suffering.

IV. Other Documents

Plaintiff is not in the possession, custody, or control of any: a) insurance agreements which would indemnify any judgment entered in this action; b) any expert reports; c) investigative reports d) any contracts entered into between parties to this action except as follows:

1. Personnel file of Plaintiff from Federal Reserve Bank of Boston

By Plaintiff's Attorney,



David Green, Esquire
ALFORD & BERTRAND, L.L.C.
60 Arsenal Street
P.O. Box 322
Watertown, MA 02471-0322
(617) 926-8800

CERTIFICATE OF SERVICE

I, Donald J. Bertrand, Esquire, hereby certify that a copy of the foregoing has been served upon Defendant's attorney, Stephen Hughes, Esquire, by mailing same by U.S. Mail, postage prepaid addressed to Ilene Robinson Sunshine, Esq., Sullivan and Worcester, One Post Office Square, Boston, MA 02109, this 12th day of May, 2005.



David Green, Esquire